

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
VICTORIA DIVISION**

In re:	§	Chapter 7
	§	
Q'MAX AMERICA, INC., <sup>1</sup>	§	Case No. 20-60030-CML
	§	
Debtor.	§	Jointly Administered

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**MOTION FOR EMERGENCY STATUS CONFERENCE**

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**THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.**

**REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.**

**EMERGENCY RELIEF HAS BEEN REQUESTED. IF THE COURT CONSIDERS THE MOTION ON AN EMERGENCY BASIS, THEN YOU WILL HAVE LESS THAN 21 DAYS TO ANSWER. IF YOU OBJECT TO THE REQUESTED RELIEF OR IF YOU BELIEVE THAT THE EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU SHOULD FILE AN IMMEDIATE RESPONSE. A STATUS CONFERENCE HAS BEEN REQUESTED ON OR BEFORE JUNE 3, 2020.**

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Q'Max America Inc. (2319) and Anchor Drilling Fluids USA, LLC (5395).

TO THE HONORABLE CHRISTOPHER M. LOPEZ, UNITED STATES BANKRUPTCY JUDGE:

COMES NOW Christopher R. Murray, Chapter 7 Trustee (“Trustee”), for Q-Max, America, Inc., et al. (“**Debtors**”) and files this *Motion for Emergency Status Conference* (“**Motion**”) and in request of such Motion, respectfully states as follows:

1. On May 24, 2020 (“**Petition Date**”), the Debtors filed voluntary petitions for relief under chapter 7 of the Bankruptcy Code commencing the Chapter 7 Cases.
2. On or about May 24, 2020, the United States Trustee appointed the Trustee as the duly qualified trustee over the Debtors’ chapter 7 estates.
3. On May 27, 2020, the Trustee filed an *Emergency Motion to: (1) Operate Business; (2) Continue Operation of Business; and (3) Maintain Cash Management System* [Dkt. No. 7], which was granted by Order dated May 28, 2020 [Dkt. No. 43].
4. An Emergency hearing is requested to advise the Court of the status of the sales transaction, post-petition operations, and the post-petition credit facility. The Trustee anticipates filing motions relating to these matters prior to June 3 at 2:00 p.m. However, given the shortened notice provided to creditors and other parties in interest, the Trustee anticipates the Court setting a hearing on the bidding procedures for a later date.

#### **PRAYER FOR RELIEF**

WHEREFORE, the Trustee respectfully requests that the Court permit an Emergency Status Conference at the hearing currently scheduled on June 3, 2020 at 2:00 p.m.; and for such other and further relief as the Court deems appropriate.

Dated: June 2, 2020

Respectfully submitted,

McDowell Hetherington LLP

By: /s/ Jarrod B. Martin

Jarrod B. Martin  
Texas Bar No. 24070221  
1001 Fannin Street  
Suite 2700  
Houston, TX 77002  
P: 713-337-5580  
F: 713-337-8850  
E: [Jarrod.Martin@mhllp.com](mailto:Jarrod.Martin@mhllp.com)

*Attorneys for Christopher Murray,  
Chapter 7 Trustee*

**CERTIFICATE OF SERVICE**

The undersigned certifies that on June 2, 2020 a true and correct copy of the foregoing Motion was served electronically on all parties registered to receive electronic notice of filings in this case via this Court's ECF notification system.

/s/ Jarrod B. Martin  
Jarrod B. Martin

**BLR 9013-1(I) CERTIFICATE**

Pursuant to BLR 9013-1(i), I hereby certify that the information contained in the foregoing document with respect to the need for emergency relief is true and correct to the best of my knowledge.

/s/ Jarrod B. Martin  
Jarrod B. Martin